



July 2, 2018

Ms. Apple Chapman  
Deputy Director, Air Enforcement Division  
Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, D.C. 20004

Re: Supplemental Letter - New Owner Clean Air Act Audit Program for Oil and Natural Gas Exploration and Production Facilities ("Audit Program")

Dear Ms. Chapman:

The Domestic Energy Producers Alliance (DEPA) is submitting this letter to supplement its previous letter, dated June 4, 2018, which commented on the EPA's draft New Owner Clean Air Act Audit Program ("Audit Program").

DEPA previously commented that details in EPA's draft Audit Program impose an unreasonably dogmatic and stringent paradigm for what constitutes "compliance" to qualify for the benefits offered by the program. The draft Audit Program contains uniform, prescriptive engineering and design standards that are not based on science, impose unreasonable burdens on the operator, and cannot be applied equally across all fields, plays and types of operations.

DEPA has developed an alternative set of proposed guidelines that achieve the same fundamental goals for incentivizing new operators' compliance with the Clean Air Act, but do so with a more flexible, common-sense approach. We would like the opportunity to present these to EPA in order to begin a more productive dialogue on incentives to achieve a voluntary self-audit program that will not conflict with state programs and provide sufficient flexibility for attaining compliance across different geographies and types of upstream oil and gas operations.

Sincerely,

**DOMESTIC ENERGY PRODUCERS ALLIANCE**

A handwritten signature in blue ink, appearing to read "J. Roger Kelley", is written over the printed name and title.

J. Roger Kelley  
Chairman – Regulatory

cc: Patrick Traylor, Deputy Assistant Administrator, Office of Enforcement & Compliance  
Doug Benevento, Region 8 Administrator  
Tim Sullivan, EPA  
Christopher Williams, EPA